



RE: Clarification of EPA-R5-2016-000164

Leticia Spinks

to:

Group R5Foia

10/08/2015 12:02 PM

Hide Details

From: Leticia Spinks <LSpinks@PondNorth.com>

To: Group R5Foia/R5/USEPA/US@EPA,

RE: Crystal Besson (dec. Gerald) vs. 3M Co., etal.

LASC CASE NO.: BC489731

Our client: Genuine Parts Co. ("GPC")

Our ref#: 4325-1726

Dear Ms. Wheatley:

This firm represents defendant GPC in the above-referenced asbestos litigation matter, currently pending in Los Angeles County, CA. Under the Freedom of Information Act ("FOIA"), the California Public Records Act section 6250 et seq. ("CPRA") & the Wisconsin State Public Records Law §§ 19.31-19.39, I am writing to obtain copies of public records, as more fully identified below:

Requested "TIMEFRAMES" & "LOCATIONS":

TIME PERIOD	LOCATION
1958-1961	Raymond Simonet 2724 Libal Street Green Bay, WI 54301
1958-1961	Fred E Nick Co. Inc Route 1 Green Bay, WI 54301
1958-1962	Red Banks Supper Club Route 1 Green Bay, WI 54301
1959-1964	Shorewood Company PO Box 2124 Green Bay, WI 54306
1960-1964	Cliffs Standard Service 229 South Washington Street

	Green Bay, WI 54301
1961-1965	Instant Car Wash Inc 500 W. Mason Green Bay, WI 54303
1961-1964	Sisels Downtown Standard Service 1641 Main Street Green Bay, WI 54302
1962-1969	Vanmillers Military Standard Service 612 S. Military Green Bay, WI 54303
1963-1968	Pierquets Standard Serv 1459 Willow Street Green Bay, WI 54302
1966-1971	Bay Heating Service Co 2220 University Green Bay, WI 54302-4511
1969-1971	Ultra Plating Co. PO Box 2423 Green Bay, WI 54306-2423
1968-1971	Dicks Standard Service 2532 Willow Street Green Bay, WI 54301
1968-1971	Cy Vancamp Oil Co. 1776 Velp Green Bay, WI 54303
1968-1971	Badger Northland Inc. 1215 Hyland Avenue Kaukauna, WI 54130-1441

1968-1976	Goldbond Ice Cream 808 Packerland Drive Green Bay, WI 54303
1970-1973	Tilot Enterprises, Inc. 730 Scheuring Road De Pere, WI 54115-1702
1972-1975	Denmark Standard Station 250 Wisconsin Ave Denmark, WI 54208
1973-1994	Truck Equipment Inc. PO Box 11296 Green Bay, WI 54307-1296
1986-2013	AMA Heating & Air Conditioning 710 Lombardi Avenue Green Bay, WI 54304-3731
1991-1999	Paper Transport Inc. 2701 Executive Drive Green Bay, WI 54304-5497

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FOIA REQUEST

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DEFINITIONS

1. "LOCATION" as used herein shall mean and refer to LOCATION, located at or about ADDRESS PROVIDED.
2. "ALL DOCUMENTS AND TANGIBLE ITEMS" as used herein shall mean "writings," including the originals and all non-identical duplicates, whether different from the originals by reason of any notation made on such copies or otherwise, and includes, without limitation, receipts, purchase orders, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, telex, telefax, minutes, contracts, reports, studies, statements, summaries, interoffice and intra-office

communications, notations of any sort of conversations, telephone calls, meetings or other communications, computer printouts, tape recordings, audiotapes, videotapes, charts, graphs, and electronic, mechanical or electronic records, compact discs, computer discs, computer tapes, computer software, electronically stored media, and any other form of stored information.

3. "RELATING TO" as used herein shall refer to anything relating to, concerning, reflecting, evidencing, referring to, depicting, identifying, describing, containing any information regarding, instructing, controlling, directing, prohibiting, or otherwise pertaining to.

4. "ASBESTOS" as used herein shall refer to any amount of mineral ASBESTOS, including but not limited to, any and all raw and/or processed ASBESTOS fibers including but not limited to vermiculite, amosite, tremolite, chrysotile and crocidolite, in ASBESTOS-containing materials.

5. "AHERA" as used herein shall refer to the Asbestos Hazard Emergency Response Act.

DOCUMENTS AND OTHER TANGIBLE ITEMS REQUESTED

1. Any and all DOCUMENTS RELATING TO the presence of ASBESTOS at LOCATION from TIMEFRAME.

2. Any and all DOCUMENTS RELATING TO violations or citations RELATING TO ASBESTOS at LOCATION from TIMEFRAME.

3. Any and all DOCUMENTS RELATING TO any ASBESTOS abatement work performed at LOCATION from TIMEFRAME.

4. Any and all DOCUMENTS RELATING TO any air testing or sampling at LOCATION from TIMEFRAME.

5. Any and all DOCUMENTS RELATING TO any air testing or sampling for ASBESTOS at LOCATION from TIMEFRAME.

6. Any and all DOCUMENTS RELATING TO any bulk sampling at LOCATION from TIMEFRAME.

7. Any and all DOCUMENTS RELATING TO any air bulk sampling for ASBESTOS at LOCATION from TIMEFRAME.

8. Any and all DOCUMENTS RELATING TO any building permits RELATING TO construction, demolition or remodel work performed at LOCATION from TIMEFRAME.

9. Any and all DOCUMENTS RELATING TO inspections RELATING TO ASBESTOS at LOCATION from

TIMEFRAME.

10. Any and all DOCUMENTS RELATING TO the use, application, repair, installation, replacement and/or specification of any product that may contain ASBESTOS at LOCATION from TIMEFRAME.
11. Any and all DOCUMENTS RELATING TO the presence of products or materials that may contain ASBESTOS, including (but not limited to) insulation, asbestos-cement pipe, boilers, packing, gaskets, pumps and valves at LOCATION from TIMEFRAME.
12. Any and all DOCUMENTS RELATING TO the construction, remodel, demolition, maintenance, or structural repair performed at LOCATION from TIMEFRAME.
13. Any and all DOCUMENTS RELATING TO outside contractors who worked with or around, installed, removed or disturbed, ASBESTOS or ASBESTOS-containing materials at LOCATION from TIMEFRAME.
14. Any and all DOCUMENTS RELATING TO permits, certifications or authorizations RELATING TO ASBESTOS or ASBESTOS-containing materials at LOCATION from TIMEFRAME.
15. Any and all DOCUMENTS RELATING TO AHERA inspections, violations, citations, air testing or sampling, bulk sampling or testing, records, reports, studies, and building permits at LOCATION from TIMEFRAME.

If there are any fees for searching or copying these records, please inform me if the cost will exceed \$25.00. However, I would also like to request a waiver of all fees in that the disclosure of the requested information is in the public interest and for litigation purposes. This information is not being sought for commercial purposes. Additionally, if access to the records requested herein will take longer than the standard time limit established by FOIA regulations (approx. 1 month), please contact me with information about when I can expect the requested copies.

If you deny any or all of the above requests, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal process available to me under the law. Thank you for your courtesy and cooperation in this matter.

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From: r5foia@epa.gov [<mailto:r5foia@epa.gov>]
Sent: Thursday, October 08, 2015 9:36 AM
To: Leticia Spinks
Subject: Clarification of EPA-R5-2016-000164

10/08/2015 12:33 PM
FOIA Request: EPA-R5-2016-000164

Ms. Spinks,

We have received your request and are in need of clarification. Please specify the records or type of records you are requesting from the USEPA under the Freedom of Information Act (FOIA). If you know or believe EPA has records that you are seeking give as much information as you can about the records so we may assign to the program .

I look forward to hearing from you.

Jessica M. Wheatley